

UNITED STATES DISTRICT COURT  
District of Massachusetts

FILED  
IN CLERKS OFFICE  
2006 MAR 23 P 1:10

U.S. DISTRICT COURT  
DISTRICT OF MASS.

PETER A. CRAWFORD, Plaintiff

v.

WOLVERINE, PROCTOR & SCHWARTZ, INC.,  
Steven F. Chilinski, Deepak S. Kulkarni,

Defendants

DOCKETED

PLAINTIFF'S REFILED MOTION TO AMEND AND DISSOLVE PROTECTIVE  
ORDERS IN LIGHT OF THE AMENDED COMPLAINT

REQUEST FOR ORAL ARGUMENT

Plaintiff hereby requests, pursuant to Local Rule 7.1(d), that oral argument be permitted on this motion.

MOTION

Plaintiff refiles this motion following the denial, without prejudice, of his prior motion (Docket #52), based on the mistaken belief that there was a Second Amended Complaint. There has been only one amendment to the Complaint. When defendants filed their opposition to the prior motion on March 10, 2006, they alleged that the Amended Complaint had not been filed. The plaintiff immediately sent a copy to the clerk and the Amended Complaint was undeniably filed on March 13, 2006 (entered March 15, 2006). The predecessor to this motion was denied on March 16, 2006. Plaintiff refiles this motion and relies upon his previous memorandum (Docket #53), filed

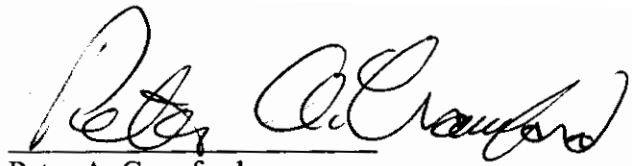
on February 22, 2006 in support. Now comes the plaintiff in the above-captioned action, and moves that this Honorable Court:

1. Dissolve its January 6, 2006 protective order relating to the 2005 recapitalization and the 2005 financial statements, issued in response to Defendants' Cross-Motion for a Protective Order; and
2. Modify its January 6, 2006 protective order relating to payments made to defendant Kulkarni, issued in response to Defendants' Second Motion for a Protective Order Concerning Evidence of Compensation and Other Payments Made to Deepak Kulkarni to permit inquiry into any payments to Mr. Kulkarni by any of the Wolverine Entities after the 2001 recapitalization (December 28, 2001), as further set forth in the accompanying Memorandum; and
3. Modify its January 6, 2006 order, issued in response to Plaintiff's Motion to Compel Responses to his Request for Production of Documents, Set No. 1, such that Request 3 must be responded to without any limitation based upon the date that any document was generated.

CERTIFICATE OF CONFERRAL

Plaintiff hereby certifies that he has complied with the provisions of Local Rule 37.1, as further detailed in the accompanying memorandum. Subsequently, plaintiff exchanged e-mails with defendants counsel, who insisted that this motion be refiled.

Respectfully submitted,

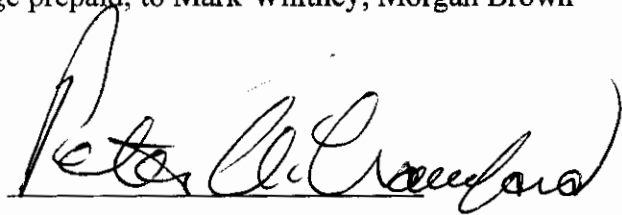
A handwritten signature in black ink, appearing to read "Peter A. Crawford", written over a horizontal line.

Peter A. Crawford, pro se  
23 Newcastle Dr. #11  
Nashua, NH 03060  
(603)888-4574

Date: March 22, 2006

Affidavit of Service

I, Peter A. Crawford, plaintiff, hereby say and depose, under pains and penalties of perjury, that I this day served the within papers upon defendants' attorney, by causing copies thereof to be mailed, first class postage prepaid, to Mark Whitney, Morgan Brown & Joy, 200 State St., Boston, MA 02109.

A handwritten signature in black ink, appearing to read "Peter A. Crawford", written over a horizontal line.

Date: March 22, 2006